

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

In re:

**James C. McDaniels, Jr. and  
Amy L. McDaniels**

Debtors.

Docket No. 18-00748-swd  
Hon. Scott W. Dales

---

**EX PARTE MOTION TO EXTEND TIME FOR ENTRY OF  
REAFFIRMATION AGREEMENT**

Now Comes Debtors James C. McDaniels, Jr. and Amy L. McDaniels, (the “Debtors”), through their attorney the Witte Law Offices, PLLC, request an extension of time for entry of a reaffirmation agreement with respect to property located at 1805 Wesley Place, Lansing, MI 48906-3841, and in support of state as follows:

1. Debtors filed for relief under chapter 7 of the United State Bankruptcy Code on February 27, 2018;
2. The deadline for Objections to Discharge is June 25, 2018.
3. The Debtors wishes to enter into a reaffirmation agreement for the debt secured by property located at 1805 Wesley Place, Lansing, MI 48906;
4. Pursuant to FED R. BANKR. P. 4008, the time for filing reaffirmation agreements in the instant case will expire shortly; however, the Court may at any time in its discretion enlarge the time to file a reaffirmation agreement.

5. Debtors have not yet received a reaffirmation agreement with respect to the home located at 1805 Wesley Place, Lansing, MI 48906, but anticipate receiving one from the mortgage lender.

WHEREFORE the Debtors respectfully requests that the Court enter an Order Granting the ExParte Motion to Extend Time for Entry of the Reaffirmation Agreement.

Respectfully submitted

**JAMES C. McDANIELS AND AMY L.  
McDANIELS**

Dated: June 18, 2018

/s/ Norman C. Witte

Norman C. Witte (P40546)  
WITTE LAW OFFICES, PLLC  
Attorneys for Debtors  
119 E. Kalamazoo Street  
Lansing, Michigan 48933-2111  
(517) 485-0070  
Facsimile (517) 485-0187